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February 7, 2012

Via ECF
Honorable Brian N. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East – Room 717S
Brooklyn, New York 11201

Re: Lowenbein v. United Collection Bureau
Case No.: 11 CV 4639 (BNC)
Our File No.: 7740

Dear Judge Cogan:

I represent the defendant in the above-matter. I submit this letter application for an Order compelling plaintiff to respond to the discovery demands timely served by the defendant, in accordance with the Civil Case Management Plan filed in this matter. While plaintiff's counsel, Mr. Fishman, has provided me with certain selected materials he believes support his claims in this matter, I advised Mr. Fishbein that I disagree with his analysis. There are ongoing discussions between me and Mr. Fishbein which may lead to a resolution of this case. However, in the event that our efforts do not result in settlement of this matter, plaintiff's discovery responses are overdue. Therefore, I request that this Court issue an Order compelling plaintiff to respond to the demands within a time certain. Currently, all non-expert discovery was to be completed by February 8, 2012. Plaintiff's counsel has not served any discovery demands upon the defendants.

For all of the above reasons, I respectfully request that this Court issue an Order in accordance with the above.

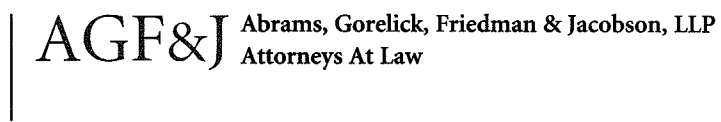
Thank you for your consideration of the above. I await further instruction from the Court.

Respectfully yours,
ABRAMS, GORELICK, FRIEDMAN
& JACOBSON, LLP

BY: 

Barry Jacobs

CC: Via ECF and e-mail: fishbeinadamj@gmail.com
Adam J. Fishbein, P.C.
Attorney for Plaintiff



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